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Attorney for Plaintiff PHYLLIS H.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

| | | |
|----------------------------------|---|--------------------------------------|
| PHYLLIS H., |) | CASE NO. Case 3:22-cv-03940-SK |
| |) | |
| Plaintiff, |) | JOINT STIPULATION AND ORDER |
| |) | EXTENDING PLAINTIFF'S TIME TO |
| v. |) | FILE MOTION FOR SUMMARY |
| |) | JUDGMENT |
| |) | |
| KILOLO KIJAKAZI, |) | |
| Commissioner of Social Security, |) | |
| |) | |
| Defendant. |) | |

IT IS HEREBY STIPULATED by and between the undersigned attorneys, subject to the approval of the Court, that Plaintiff's time for submitting Plaintiff's Motion for Summary Judgment be extended by 30 days, from November 1, 2022, to December 1, 2022. This is Plaintiff's first request for an extension of time.

There is good cause for this extension because Plaintiff's counsel was out of the office in recent weeks due to Plaintiff's counsel's mother being hospitalized for heart failure. Plaintiff's counsel is also responsible for over 20 other cases pending in the United States District Court and two cases pending in the United States Court of Appeals for the Ninth Circuit. Additionally, Plaintiff's counsel is a managing attorney at counsel's employer and is responsible for advice and counsel on a range of cases and administrative issues.

1 Plaintiff shall have an extension of 30 days in which to file Plaintiff's Motion for
2 Summary Judgment. The parties further stipulate that all subsequent deadlines in the Court's
3 Procedural Order for Social Security Review Actions shall be extended accordingly.

4 The parties stipulate in good faith with no intent to prolong proceedings unduly.

5 This is Plaintiff's first request for an extension of time.

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7 Respectfully submitted,

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9 Dated: October 28, 2022

By:

10 /s/ David P. Waggoner

11 DAVID P. WAGGONER
12 HOMELESS ACTION CENTER
13 Attorneys for Plaintiff

14 Dated: October 28, 2022

By:

15 /s/ Caspar Chan

16 CASPAR CHAN
17 Assistant Regional Counsel
18 (as authorized via email on October 28, 2022)

19 **ORDER**

20 Pursuant to the Stipulation, Plaintiff is granted an additional 30 days, until December 1,
21 2022, to file Plaintiff's Motion for Summary Judgment.

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23 **IT IS SO ORDERED.**

24
25 Dated: October 28, 2022

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27 HONORABLE SALLIE KIM
28 UNITED STATES MAGISTRATE JUDGE